

EXHIBIT 1

**Plaintiffs' More Definite Statement as to
Defendant Abdullah bin Khalid bin al-Thani**

Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849; World Trade Center Properties LLC, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7280 (RCC); and Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7279 (RCC), including all of the allegations and claims contained therein.

1. Abdallah bin Khalid bin al-Thani is a member of the al-Thani ruling family of Qatar and the Minister of Waqf (Endowments) and Islamic Affairs, who rose to prominence as the head of the army's elite Armored Regiment.
2. Sheikh al-Thani's name, prior to the events of September 11, has appeared on government lists of individuals under investigation for financing terrorism. Al-Thani was known to have aided and harbored terrorists and al Qaeda officers, such as Defendant Khalid Sheikh Mohammed, Mohammed Atef, Ayman Zawahiri, and Abu Mussab al-Zarqawi.
3. In the mid-1990's, when Sheikh al-Thani was the Qatari Minister of Religious Affairs, he hosted Defendant Khalid Sheikh Mohammed ("KSM"), admitted architect of the September 11, 2001 attacks and a senior al Qaeda member, at his farm outside Doha. At this time, KSM was wanted by US officials, following a grand jury indictment in the Southern District Court of New York, which accused KSM of masterminding the Bojinka plot, a plan to down several American airliners operating in Southeast Asia. Others convicted in the Bojinka Plot include mastermind of the 1993 World Trade Center bombing Ramzi Yousef as well as Yousef's roommate and accomplice in the Philippines, Abdul Hakim Murad.
4. FBI officials have speculated that KSM may have been tipped off by al-Thani before agents were granted permission to enter Qatar and arrest him in 1996. Retired CIA officer Robert Baer said that once the agents arrived, the Head of Qatar's National Security indicated that a member of the ruling family (most likely al-Thani) ordered him to issue blank passports to four individuals. These included KSM, as well as top bin Laden aides Mohammed Atef and Ayman Zawahiri. Zawahiri is also the founder of Specially Designated Global Terrorist (S.D.G.T.) the Egyptian Islamic Jihad.

5. In late 2001, Saudi intelligence has indicated that KSM may have spent two weeks in Qatar “with the help of prominent patrons” that most likely included al-Thani, amongst others.

6. Furthermore, intelligence reports have indicated that al-Thani operated a safe house (possibly the same farm where KSM stayed) for another high-ranking al Qaeda official, Abu Mussab al-Zarqawi. Zarqawi is believed to have provided chemical and explosives training to S.D.G.T. Ansar al-Islam, an al Qaeda affiliated organization which operates in Kurdish Northern Iraq. Zarqawi, according to Colin Powell’s February 6, 2003 address to the UN Security Council, created the environment for which “nearly two dozen extremists converged on Baghdad and established a base of operations there.” Officials have also indicated that al-Thani “provided Qatari passports and more than \$1 million in a special bank account to finance the network” in Baghdad.

7. Al-Thani has been characterized by the Baghdad publication *al-Thawrah* as the “standard bearer” of the Qatari fundamentalists and a strong driving force behind the “alliance deal struck between the State of Qatar and the Emirate of Afghanistan” during the rule of the Taliban. The same article makes references to reports that suggest Osama bin Laden himself, not Mullah Mohammed Omar, was actually in charge of the Afghani delegation at these meetings, citing the existence of “a shadowy relationship” between al-Thani and bin Laden. Al-Thani has also been known to align himself ideologically with the top Muslim cleric in Qatar, Defendant Dr. Yusuf al-Qardawi, who is the head of the Muslim Brotherhood in Qatar and has frequently called upon Muslims in Qatar to wage holy war against Israel and the West.